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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

THE TRAVELERS INDEMNITY COMPANY, a foreign insurance company,

Plaintiff,

v.

MCKINSTRY CO., LLC. a Washington limited liability company, SELLEN CONSTRUCTION CO., INC., a Washington Corporation, URBAN VISIONS MFA SECOND & PIKE LLC, a Washington limited liability company,

Defendants.

No. 2:24-cv-1718

STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINES
FOR URBAN VISIONS MFA SECOND
& PIKE TO ANSWER TRAVELERS'
COMPLAINT

NO ORAL ARGUMENT REQUESTED

Pursuant to Western District of Washington Local Civil Rule 10(g), Plaintiff The Travelers Indemnity Company ("Travelers") and Defendant Urban Visions MFA Second & Pike LLC ("Urban Visions") by and through their undersigned attorneys, stipulate and move as follows:

1. STIPULATION

Travelers and Urban Visions hereby stipulate and agree to extend the time for Defendant Urban Visions to file their Answer to Travelers' Complaint. The Answer shall be due within 14 days of the Court's Order on the pending Motions to Stay. If the Motions to Stay are granted and

STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINES FOR UV TO ANSWER COMPLAINT -1 Cause No. 2:24-cv-1718

1 a stay of the case is effectuated, then no answer shall be due until after the stay is lifted. 2 DATED this 7th day of March 2025 3 The undersigned hereby certifies that this 4 108 memorandum contains words. compliance with the Local Civil Rules. 5 LETHER LAW GROUP 6 s/N. Chance Laboda 7 N. Chance Laboda, WSBA #54273 1848 Westlake Ave N., Suite 100 8 Seattle, WA 98109 P: 206-467-5444 / F: 206-467-5544 9 claboda@letherlaw.com Counsel for Plaintiff, The Travelers Indemnity 10 Company 11 s/ Tristan Swanson Tristan N. Swanson, WSBA No. 41934 12 MILLER NASH LLP 605 5th Ave S, Ste 900 13 Seattle, WA 98104 Tel: (206) 777-7530 14 Fax: (206) 340-9599 tristan.swanson@millernash.com 15 Counsel for Defendant, Urban Visions MFA Second & Pike 16 17 18 19 20 21 22 23

STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINES FOR UV TO ANSWER COMPLAINT -2 Cause No. 2:24-cv-1718

II. ORDER

Pursuant to the foregoing stipulation of the parties, it is hereby ORDERED that the deadline for Urban Visions to Answer Travelers' Complaint shall be within 14 days of the Court's Order on the pending Motions to Stay. If the Motions to Stay are granted and a stay of the case is effectuated, then no answer shall be due until the stay is lifted.

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IT IS SO ORDERED

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DATED March 10, 2025.

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PRESENTED BY:

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Jana SC.

Honorable Tana Lin United States District Judge

LETHER LAW GROUP

s/N. Chance Laboda

N. Chance Laboda, WSBA #54273
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Seattle, WA 98109
P: 206-467-5444 / F: 206-467-5544
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s/ Tristan Swanson

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STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINES FOR UV TO ANSWER COMPLAINT $-\,3$ Cause No. 2:24-cv-1718

1	Fax: (206) 340-9599
2	tristan.swanson@millernash.com Counsel for Defendant, Urban Visions MFA Second
3	& Pike
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STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINES FOR UV TO ANSWER COMPLAINT – 4 Cause No. 2:24-cv-1718

CERTIFICATE OF SERVICE

The undersigned hereby certifies under the penalty of perjury under the laws of the State of Washington that on this date I caused to be served in the manner noted below a true and correct copy of the foregoing on the following party(ies):

Todd C. Hayes
HARPER | HAYES PLLC
1200 Fifth Avenue, Suite 1208

1200 Fifth Avenue, Suite 1208 Seattle, WA 98101 P: (206) 340-8793 todd@harperhayes.com Counsel for McKinstry Co., LLC

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Second & Pike

By: [] First Class Mail [X] E-Service/Email [] Legal Messenger

DATED this 7^{th} day of March 2025 at Seattle, Washington.

<u>s/ Brittany Lang</u> Brittany Lang | Paralegal

STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINES FOR UV TO ANSWER COMPLAINT $-\,5$ Cause No. 2:24-cv-1718